

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

In Re:)	
)	
OKLAHOMA FORGE, LLC, d/b/a)	Case No. 24-11060-M
OKLAHOMA FORGE, INC.)	Involuntary Chapter 7
)	
Alleged Debtor.)	

ANSWER TO INVOLUNTARY PETITION

Oklahoma Forge, LLC, d/b/a Oklahoma Forge, Inc., (“OKF”), for its Answer to the Involuntary Petition filed herein on August 16, 2024 [Doc. 1], (the “Petition”) as follows:

1. OKF is without sufficient information to admit or deny jurisdiction.
2. OKF admits it is not generally paying its bills as they become due.
3. OKF denies the petitioning creditors have standing to commence the petition.
4. OKF, upon information and belief, denies Ellwood Quality Steels Company and Ellwood National Steel Company should be considered two separate entities for purposes of the Petition, therefore OKF denies the Petition complies with 11 U.S.C. § 303(b)(1).
5. OKF disputes the dollar amounts alleged in the Petition.
6. Ellwood Quality Steels Company and Ellwood National Steel Company are direct competitors of OKF. Upon information and belief, these two petitioning creditors commenced this involuntary case to eliminate a business competitor and as such this case is a two-party dispute filed in bad faith. The interests of the creditors are better

served by the dismissal of this case. This Court should abstain and dismiss this case under 11 U.S.C. § 305(a)(1).

7. OKF requests the Court grant it 90 days to conduct discovery before conducting an evidentiary hearing on the Petition.

Wherefore, OKF prays the Court set a discovery deadline for approximately 90 days and upon hearing this matter, dismiss the Petition and grant judgment against the petitioning creditors for attorney fees, damages, both actual and punitive, and for the costs of this action.

Respectfully submitted,

s/ Mark A. Craige

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Certificate Of Electronic Service

The record herein reflects that on the same day this pleading was electronically filed, a copy was electronically served upon counsel of record and other parties as shown in the record herein.

/s/Mark A. Craige_____